M E M O R A N D U M

To: Bill Maxwell, U.S. Environmental Protection Agency, OAQPS (MD-13)

FROM: Mary Lalley, ERG/RTP

DATE: January 6, 1996

SUBJECT: **Final Summary of December 19, 1996 ICCR Process Heater Work Group Conference Call**

1.0 PURPOSE

The purpose of the conference call was to discuss progress on voluntary information collection efforts, the agenda for the January 7, 1997 Process Heater Work Group meeting, and the presentation to be made at the January 8 Coordinating Committee meeting. Additional topics discussed include the information collection time line and the information collection plan. A presentation was made on the database being developed by the EPA for the ICCR.

2.0 CONFERENCE CALL PARTICIPANTS

Conference call participants included representatives of the OAQPS Emission Standards Division, trade associations, and state agencies. A complete list of participants (with their affiliation) is included as attachment 1.

3.0 SUMMARY OF DISCUSSION

3.1 Voluntary Information Collection

A representative of the Chemical Manufacturers Association (CMA) provided that CMA will be performing a voluntary information collection among their membership. The information collection will use API's questionnaire and approach as a basis but modifications will be required. The CMA is currently developing a tentative sampling plan and schedule to present to the work group for approval.

The CMA representative suggested that CMA and API outline their surveys and approaches for the work group to approve. An industry representative suggested that high-level endorsement from CMA and API would help to assure EPA that voluntary information collection will be successful. An API representative provided that API has produced a letter to be sent to refineries urging cooperation with the voluntary information collection effort.

An industry representative stated that information, including emission test data and permit data, has been compiled and will be made available for process heaters at four large facilities.

An EPA representative suggested that the group consult the EPA's information collection time line and be prepared to discuss with the Coordinating Committee how the proposed schedule will be met by voluntary collection efforts. The EPA representative also recommended the inclusion of a point on the time line at which the voluntary efforts will be evaluated and, if not successful, a back-up plan will be initiated. The EPA representative provided that the Coordinating Committee will want to understand how the voluntary collection efforts will obtain the same information, of the same quality, that would be obtained through a mandatory EPA-sponsored survey.

3.2 ICCR Database

A representative of Alpha-Gamma, a contractor for EPA, gave a presentation on the ICCR database of combustion devices which is currently being developed. Presentation topics included the format for the database, the types of data to be included, the sources from which data are being collected and the overall approach and time line for populating the database. The

information contained in the handout for the presentation is included as attachment 2.

Following the presentation the Alpha-Gamma representative answered questions from the group. During the question and answer period, the Alpha-Gamma representative stated that it is possible to identify the geographical location of facilities in the database. He also explained that data were obtained from the AIRS and OTAG databases for all possible ICCR combustion units and that, because the units are identified by source classification code (SCC) it will be relatively easy to delete any that are determined not to be subject to the ICCR. In response to questions regarding test data, the Alpha-Gamma representative provided that, currently, only test data for toxic pollutants are being analyzed. An EPA representative added that test data are available for toxic and criteria pollutants but that the focus is currently on toxic emissions because less is known about them. An industry representative concurred, stating that facilities are currently required to inventory, but not monitor, toxic pollutant emissions and are more likely to monitor criteria pollutant and volatile organic compound (VOC) emissions. The Alpha-Gamma representative suggested that work group members submit any source test data that are available to them.

An industry representative asked if it will be possible to determine the geographical location of facilities for which source test data are available. He explained this is important because it may be more likely for facilities located in States with more stringent control requirements to provide test data, causing a MACT floor based on these data to be biased. The Alpha-Gamma and EPA representatives stated that is it possible to determine the states from which test data are received. EPA representatives suggested that once the data are analyzed, it can

be determined if a bias exists and this bias can be corrected for through additional data collection.

An industry representative proposed that data gathered through industry group efforts should be retained in a format compatible with the ICCR database. An EPA representative suggested that the structure of the database be provided to industry group representatives. The Alpha-Gamma representative and an EPA representative explained that as phases of the database are completed, the database will be made available so that people can become familiar with it.

3.3 Information Collection Time Line

An EPA representative suggested that the group refer to the information collection time line included in a memo he recently sent out (available on the Process Heater Work Group TTN bulletin board as timeline.wpf and timeline.doc). The time line presents the schedule of events that must occur to allow for promulgation of ICCR standards in November, 2000. The EPA representative explained that the time line accommodates and provides a schedule for voluntary information collection efforts. According to the time line, Section 114 questionnaires, if needed, will be sent out by mid-February. The EPA representative provided that the ICCR information collection request is currently being reviewed by the Office and Management and Budget. The EPA representative stated that voluntary and Section 114 collection efforts should be scheduled to allow the ICCR database to be populated with inventory and emission data by the early fall of 1997.

3.4 Coordination of Voluntary and Mandatory Data Collection

An industry representative suggested that process heaters at many facilities may have already been included in the ICCR database through AIRS and OTAG and that it is not necessary to

collect data for these sources. An EPA representative stated that many small sources may not be included in AIRS or OTAG and data will need to be collected for these sources. The EPA representative stated that EPA will work with industry to minimize their burden by not requesting data already obtained. An industry representative expressed a concern that it will be difficult to identify facilities and avoid duplication. The EPA representative provided that a considerable amount effort is being put into identifying duplicates in data obtained from the AIRS and OTAG databases.

3.5 Information Collection Plan

An EPA representative stated that an information collection plan needs to be developed and presented to the Coordinating Committee at their January meeting. The EPA representative provided an update on the information collection plan being developed by the Incinerator Work Group. The EPA representative explained that the Incinerator Work Group is considering sending out a 1-page questionnaire to a relatively large number of facilities. This questionnaire will be used to determine which facilities have ICCR combustion devices. Facilities with ICCR combustion devices would then receive the more detailed ICCR questionnaire. This approach addresses a concern of Incinerator Work Group members that without an initial survey, perhaps one-half to two-thirds of facilities surveyed would not have ICCR combustion devices. The EPA representative added that the Incinerator Work Group intends to incorporate voluntary information collection efforts into this approach.

One industry representative expressed a concern that an initial survey may not be necessary if a database of sources already exists. An EPA representative agreed and stated that incinerators are different from process heaters, in that, due to

their relatively small size, many may not have been included in the AIRS or OTAG databases and therefore are not in the ICCR database. The EPA representative provided that, of the 60,000 combustion sources in the ICCR database, 1,800 are incinerators.

An industry representative suggested that a mandatory survey be conducted of the sources not involved with the ICCR and asked the group how these sources could be identified. An EPA representative stated that the supporting statement for the ICCR information collection request outlines how information will be collected in the absence of voluntary efforts. Several industry representatives expressed the concern that it will be difficult to contact process heater owners and operators not involved in the ICCR. One industry representative estimated that 90 percent of process heaters are owned by petroleum refiners, chemical manufacturers and the pulp and paper industry, all of which are represented by the work group.

An EPA representative suggested that the information collection plan presented to the Coordinating Committee could include the following steps: API and CMA will address the majority of process heaters through their voluntary surveys; the work group will further narrow the definition of process heaters; and EPA will survey owners and operators of process heaters not addressed through API's and CMA's surveys. An industry representative requested that the one-page survey approach suggested by the Incinerator Work Group and sampling plans for voluntary surveys also be discussed at the next meeting.

3.6 Definition of Process Heater

An industry representative suggested that the definition of process heaters needs to be further refined to assist in targeting owners and operators for information collection. An

EPA representative suggested that this be pursued at the January 7 meeting.

In response to a question regarding the steel and glass industries, an industry representative suggested referring to the diagram of process heaters produced at the November 7, 1996 Process Heater Work Group meeting. An industry representative added that process heaters that do not match the diagram are not necessarily excluded from the ICCR and that many decisions regarding the definition of process heaters have yet to be made.

An EPA representative explained how a type of process heater could be excluded from those covered by the ICCR. The EPA representative used process heaters firing natural gas or refinery fuel gas as an example. The EPA representative suggested that if the work group determines that toxic emissions from such heaters are negligible, a recommendation can be made to the Coordinating Committee to exclude them from the ICCR process heater definition.

4.0 ACTION ITEMS

Brahim Richani of Alpha-Gamma will provide copies of the existing ICCR database to Lee Gilmer and Karluss Thomas.

Chuck Feerick will contact John Fanning to reserve a meeting room in Chicago for the day prior to the Coordinating Committee meeting on March 19 & 20.

Lee Gilmer will contact Lawrence Otwell, who was not present on the conference call, in order to maintain communications with the forest products industry.

Fred Porter suggested that work group members review the ICCR document which has recently been revised to address the handling of proprietary information, the use of alternates on work groups and other issues.

5.0 NEXT MEETING

The next meeting will be held January 7, 1997 in Washington, DC at CMA's office. The meeting will begin at 9:00. Agenda items for January 7 meeting include:

- Develop the work group's information collection plan
- Further define process heaters using the list of possible heaters and decision flow diagram
- Schedule future meetings of the Process Heater Work Group
- Prepare the presentation to be made to the Coordinating Committee

These minutes represent an accurate description of matters discussed and conclusions reached and include a copy of all reports received, issued, or approved at the December 19, 1997, meeting of the Process Heater Work Group. Bill Maxwell, EPA.

Attachment 1

December 19, 1996 Process Heater Work Group Conference Call Participants

Susan Blevins, Office of Air Quality, Texas Natural Resource Conservation Commission (TNRCC)
John Bloomer, Selas Corporation of America
Chuck Feerick, Exxon Company, USA
Bruno Ferraro, Grove Scientific Company
Lee Gilmer, Texaco, Inc.
Greg Johnson, Shell Oil Company
Mary Lalley, Eastern Research Group
Bill Maxwell, EPA, Office of Air Quality Planning and Standards
Fred Porter, EPA, Office of Air Quality Planning and Standards
Brahim Richani, Alpha-Gamma
Karluss Thomas, Chemical Manufacturers Association

Attachment 2
Information in ICCR Database Presentation Handout

ICCR DATABASE
December 19, 1996

Database is in Microsoft Access Version 2.0

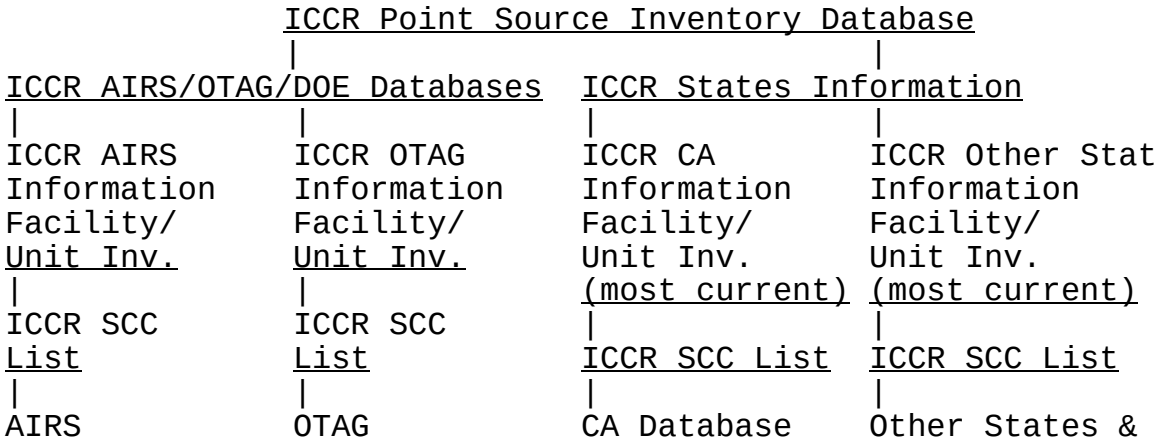
Two Types of Information
- Inventory of Sources
- Emissions Data

Potential Sources of Information Sought
- EPA Databases
- DOE Databases
- DOD Databases
- State and Local Agency Databases
- Industry/Trade Association Databases

ICCR Master Database
- Internal Com. Engines Emissions Database (source test data) (STIRS/other)
- Comb. Turbines Emissions Database (Source test data) (STIRS/other)
- Boilers Emissions Database (source test data) (STIRS/other)
- Process Heaters Emissions Database (source test data) (STIRS/other)
- Incinerators Emissions Database (source test data) (STIRS/other)
- ICCR Inventory of Point Sources Database (all Categories)

*Inventory of Sources database will be linked to Emissions database using the combustor device SCC code

Inventory of Sources



Inventory of Sources (con't)

Database	Database	(1995 inventory)	DOD Databases (most current inventories)

Database Structure Based on Draft ICR Questionnaire
- 190 fields/20 sections
- Facility/Combustor ID, Control Information, Fuel Consumption, SCC

Currently Populated With Information Within EPA
- AIRS
- OTAG
- RAPIDS
- ICWI/OSWI

Will Include Information from States With Electronic Databases

Working From a List of 648 Source Classification Codes (SCCs)

Will Be Completed by March 1997

AIRS
- Includes 87,316 ICCR combustion units
- Provides identification and type (SCC) for all units
- Fields exist in AIRS that match 74 of the 190 ICCR database fields, but AIRS is largely incomplete

OTAG
- Includes 51,327 ICCR combustion units
- Fields exist in OTAG that match 21 of the 190 ICCR database fields; OTAG is more populated than AIRS, but also less than complete

Total Number of Process Heaters in AIRS and OTAG
- 11,967 Process Heaters

Combined OTAG and AIRS Information
- Used Common ID system (State Code + County Code + Plant PNED ID)
- Approximately 20% of the ICCR combustion units are in both AIRS and OTAG
- Compared common fields electronically - *In general, selected OTAG values where OTAG and AIRS differ. Devised a coding system to identify the origin of each value in the database (Source Code field)*
- Currently combining States' information

Inventory of Sources (con't)

Emissions Data

Source Tests Data (1990 to present)
- Complete reports
- Extract/compile raw (measured) data
- All calculations performed within the database

Sources of Information
- Previous EPA projects
- State/Local agencies
- Trade associations
- Private industry

Currently Being Populated With EPA STIRS (Source Test Information Retrieval System) Data and Other Collected Test Reports
- Test reports gathered from 15 states
- Most of the test reports are on CDS
- More than 1100 source test reports for ICCR source categories (Toxics and Criteria)
- More than 237 Process Heaters

Completion by End of March 1997
- For Toxic emissions